

# TENNESSEE REGULATORY AUTHORITY

Melvin Malone, Chairman  
Lynn Greer, Director  
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460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

September 7, 1999

Mr. Jon E. Hastings  
Boult, Cummings, Conners & Berry  
414 Union Street, Suite 1600  
Nashville, Tennessee 37219

Mr. Guy Hicks  
BellSouth Telecommunications  
333 Commerce Street  
Nashville, Tennessee 37201-2300

In Re: Adoption of MCImetro/BellSouth Interconnection Agreement (Except Attachment VIII) and Request for Approval of Brooks/BellSouth Agreement. Docket No. 99-00583.

Dear Sirs:

On August 11, 1999, Brooks Fiber and BellSouth submitted the above Agreement to the TRA for approval pursuant to Section 252(e) of the Act. The filing contains an Exhibit 2 which replaces Attachment VIII of the MCImetro/BellSouth Interconnection Agreement in its entirety.

The Staff has examined the Agreement, including Exhibit 2, in the context of how it comports with regulatory/telecommunications environment changes that may have occurred since the original MCImetro/BellSouth Agreement was signed. As a result, the Staff has identified some changes that they suggest need to be made to the Agreement so it will more closely reflect the conditions as they exist. These suggested changes are listed below:

- (1) Section 1.1.2.2 of Exhibit 2 refers to a detailed service restoration and disaster recovery plan to be in effect by year end 1997. If this has been done, this section should reflect that it has. Otherwise, a new target date should be set. Since this wording has been adopted from the MCImetro Agreement, it is hoped that this item has been accomplished and that Brooks can adopt the existing plan.
- (2) Section 2.1.6 of Exhibit 2 refers to BellSouth providing to Brooks, no later than January 1, 1997, the capability to order separate intraLATA and

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to do this in Tennessee since February of this year. Shouldn't Exhibit 2 reflect this capability?

- (3) Section 2.1.8.1 of Exhibit 2 refers to BellSouth assigning NXXs to Brooks on a non-discriminatory basis until Number Administration functions are assumed by a neutral third party. This has been done. Shouldn't Exhibit 2 reflect this?
- (4) Sections 2.3.1.3 and 2.3.1.4 are missing from Exhibit 2. Shouldn't they be added?
- (5) Section 2.3.2.7 of Exhibit 2 refers to BellSouth implementing an electronic interface to allow Brooks to reserve telephone numbers on line no later than April 1, 1997. Since this wording was extracted from the MCImetro Agreement, couldn't Brooks use the same method if it is available?
- (6) Section 6.1.4.1.1 of Exhibit 2 refers to a method that BellSouth must create, by December 31, 1997, that establishes a standard format and order process that will allow Brooks to place an order through electronic exchange. Since this wording was extracted from the MCImetro Agreement, can't Brooks use the same method if it is available?
- (7) The spreadsheet on page 86 of Exhibit 2 refers to electronic interfaces that will be implemented by January 1, 1997 or an agreed upon time frame. If these were implemented under the MCImetro Agreement, can't Brooks use them?

Please provide a response to the above request by September 21, 1999. If you have any questions concerning this matter please call Carsie Mundy or Darlene Standley in the Telecommunications Division.

Yours truly,



David Waddell  
Executive Secretary